05-44481-rdd Doc 7727-1 Filed 04/18/07 Entered 04/18/07 12:00:42 Notice of Renewed Motion to Compel Pq 1 of 2

Hearing date: May 31, 2007

10:00 a.m. Eastern

Response deadline: May 24, 2007

4 p.m. Eastern

NOTICE OF RENEWED MOTION OF USW TO COMPEL DEBTORS TO SUBMIT INDIVIDUAL EMPLOYEE MATTER TO IMPARTIAL MEDICAL AUTHORITY

PLEASE TAKE NOTICE that the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO/CLC ("USW"), successor by merger to the United Steelworkers of America, and its Local Union No. 87L have filed a motion (the "Motion to Compel") in the Bankruptcy Court seeking an Order directing the Debtors to honor the impartial medical dispute provisions of the collective bargaining agreement between the USW and the Debtors.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion to Compel will be held on May 31, 2007 at 10:00 a.m. prevailing Eastern Time before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, Room 610, One Bowling Green, New York, New York 10004.

(A) PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the Motion to Compel shall be in writing, shall state with particularity the reasons for the objection or response, and shall be filed with the Court and shall be served upon counsel for the USW as set forth below, and upon counsel to the Debtors, so as to be received by 4:00 p.m. prevailing Eastern time on May 24, 2007. Only those objections which have been timely filed and served may be considered by the Court at the Hearing.

MEYER, SUOZZI, ENGLISH & KLEIN, P.C.

By: /s/ Lowell Peterson

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Attorneys for United Steelworkers

Dated: April 18, 2007